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❖ NOTICE ❖

TO: ALL MEMBERS

RE: SMALL AIRCRAFT LICENCING

To All Members

Small Aircraft Licence Proposal – Consultation closing soon.

Your comments and input, particularly if you are a member who works in GA, are needed.

The introduction of the EASA-style CASR Part 66 licences in 2011 transformed what was a relatively straight forward licence document with a positive statement of licence coverage into a document that had extensive information of what couldn't be signed for.

Many members would be aware that CASA has been in the process of creating a licence structure to cater for General Aviation and non-Type rated aircraft for several years now. Consultation and feedback with ALAEA members in General Aviation, as well as some GA organisations, gave the strong message that the preferred option was to revert to the CAR 31 Group Rating system of licencing.

The ALAEA has been participating in a CASA-lead working group and has provided that feedback to CASA. CASA indicated from the outset that that wasn't an option, so with that option off the table we worked towards a compromise.

The result was a proposal to reintroduce Group Ratings within the Part 66 structure i.e. B1.2 Group 1, Group 2 etc.

About 4 weeks ago CASA released a Discussion Paper for industry comment. This document included, for the first time, a draft of the changes to the Part 66 Manual of Standards (MOS) that provides the actual mechanics of how the new licence structure would work. The ALAEA has reviewed the draft and we are of the opinion that there is a considerable amount of work to be done to ensure that any changes to licencing will achieve the desired outcome. The changes also need to be able to be accomplished with the minimum amount of pain and anguish to an already-weary GA sector.

There are simply too many individual areas that required addressing to list here so we will highlight some of the main areas for concern.

- Complexity – the MOS amendments are unnecessarily long and complex in detail.
- Accuracy – there are multiple areas where incorrect training provisions have been made.
- Clarity of privileges – the MOS has not clearly defined the scope of privileges for the licence holder.

“Guardians of Air Safety”

- Privileges not provided for – there are a number of areas (such as Instrument privileges for mechanical LAMEs that were provided for under CAR 31) that aren't readily evident in the draft.
- The structure of the Mechanical licence.

This last point is one of the most important things to get right throughout this process. We obviously want to ensure that every existing LAME (with minor exceptions) that held a Group Rated CAR 31 licence would fit into the new structure and would be able to be issued with a licence with Group ratings if they chose to apply. This was made clear in our submissions and appeared to be accepted by the working group in general.

Unfortunately the final structure published in the 3rd consultation document doesn't meet that specification. CASA is insisting that a Mechanical LAME hold both Airframe and Engine ratings before they are eligible to be issued with the Basic licence. As such any existing LAME that holds only an A/F rating or Engine Rating can only hold the massively-complex EASA style airline licence. It also means that any new prospective LAME utilising the Basics Examination and SOE pathway will not be able to apply for the Small Aircraft Licence until they have gained enough experience in both A/F and Engine categories.

It is our view, and we have made this clear to CASA, that this is an unnecessary burden on both the industry and CASA resources and should be changed. Originally CASA had applied the same principle to the Avionic licence; meaning that a B2 LAME had to hold E, I and R before they could hold the Basic licence. We submitted the same argument to CASA and, to their credit, they amended the B2 structure to allow for single category B2 Groups. We are at a loss to understand why they would not apply the same logic to the Mechanical licence.

CASA have included in the discussion document a reference to this matter and have asked specifically for feedback from the industry. They didn't include the full reasons we put in our submissions, but gave (what we think) is a pretty vague reason why they thought they shouldn't make the change.

Request for specific comments - proposal to split privileges

Both the Australian Licensed Aircraft Engineers Association (ALAEA) and Aviation Maintenance Repair and Overhaul Business Association (AMROBA) have indicated their preference to split out the airframe and engine privileges currently prescribed under the 'Group B - basic maintenance' group rating for the B1 licence into two separate Basic group ratings (in-line with what has been proposed in this draft MOS for the basic B(E), B(I) and B(R) group ratings for the B2 licence). While splitting out this B1 licence privilege provides flexibility for initial issue of a B1 licence, this flexibility would not provide the industry request for a single LAME, who after receiving the appropriate training could certify release of an aircraft after a 100 hourly maintenance event.

CASA would appreciate your comments on this alternative approach to the structure of the basic maintenance privileges for the B1 licence.

Our view is that putting a road block in front of an engineer training to become a LAME by preventing them from obtaining their licence incrementally, as they become familiar and competent with the aircraft and engine systems, is a backwards step.

The solution to this is simple – make provision for the Engine to be covered as a Group Rating as it was under CAR 31.

Generally most members rely on the Association to provide comment on regulatory matters on their behalf but it appears on the surface in this instance that CASA has included this “request for specific comments” as a means to “test” the submissions made by both ourselves and the employer association AMROBA.

To that end, we are not going to tell you how you should think, but if you agree (or disagree) with the submissions we have made in this respect we would appreciate you providing some feedback directly to

CASA on the subject.

The consultation documents can be found and downloaded here <https://www.casa.gov.au/rules-and-regulations/landing-page/changing-rules> and comments can be made by email to michael.mcgill@casa.gov.au (copy in alaea@alaea.asn.au if you like). The closing date for comment is the 8th of April (this Friday).

A further CASA working group meeting to go through the document in detail is scheduled for the 13th of April where the bulk of the issues will be debated and hopefully corrected before a Notice of Final Rulemaking is proposed.

Your prompt participation in the feedback process to CASA is very valuable.

Regards

Steve Re